

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE FASHION EXCHANGE LLC,

Plaintiff,

v.

HYBRID PROMOTIONS, LLC, JEFF CALDWELL,
JARROD DOGAN, GAVIN DOGAN,

Defendants/Counterclaimants,

and

NATIONAL STORES, INC.,
HOT TOPIC, INC.,
PACIFIC SUNWEAR OF CALIFORNIA, INC.,
ROSS STORES, INC., TWEEN BRANDS, INC.,
THE TJX COMPANIES, INC.,
THE WET SEAL RETAIL, INC.,
SPENCER GIFTS LLC,
OLD NAVY, LLC, RUE21, INC.,
J.C. PENNEY CORPORATION, INC.,
BJ'S WHOLESALE CLUB, INC.,
BOSCOV'S DEPARTMENT STORE, LLC,
WAL-MART STORES, INC.,
KOHL'S DEPARTMENT STORES, INC.
MACY'S RETAIL HOLDINGS, INC.,
MACYS.COM, INC.,
SHOPKO STORES OPERATING CO., LLC,
FAMILY DOLLAR SERVICES, INC.,
THE CATO CORPORATION,
BELK, INC., DILLARD'S, INC.,
NORDSTROM, INC.,
BEALL'S DEPARTMENT STORES, INC.,
SEARS BRANDS, LLC,
MARSHALLS OF MA, INC., BOB'S STORES, LLC,
DOLLAR GENERAL CORPORATION,
TARGET CORPORATION,
URBAN OUTFITTERS, INC.,

Defendants.
-----X

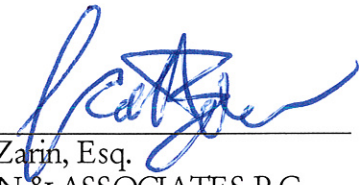
Civil Action No. 14-CV-1254 (SHS)

**PLAINTIFF'S NOTICE OF
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff The Fashion Exchange LLC ("Plaintiff"), by and through its attorneys, Zarin & Associates P.C., hereby moves for partial summary judgment against Defendants Hybrid Promotions, LLC, Jeff Caldwell, Jarrod Dogan and Gavin Dogan (collectively "Defendants") on their counterclaims in this action, pursuant to Fed. R. Civ. P. 56, for all the reasons set forth in the memorandum of law which Plaintiff has filed herewith.

Respectfully submitted,

Dated: September 28, 2015
New York, NY

By: 

Scott Zarin, Esq.
ZARIN & ASSOCIATES P.C.
One Penn Plaza, Suite 4615
New York, NY 10119
Tel. No. (212)580-3131
scottzarin@copyrighttrademarkcounsel.com
Attorneys for Plaintiff
The Fashion Exchange LLC